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*Attorneys for Defendant La Clínica de La Raza, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

MICHELLE ROBERTSON, as parent for  
minor child S.R., individually, and on behalf  
of all others similarly situated,

Plaintiff,

v.

LA CLINICA DE LA RAZA, INC.,

Defendant.

Case No. 3:23-cv-05817

**STIPULATION AND ORDER TO  
CONTINUE LA CLÍNICA DE LA  
RAZA, INC.’ ANSWER DEADLINE**

Case Removed: November 10, 2023

Complaint Filed: September 18, 2023

Trial Date: None Set

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Local Rule 6-3, Plaintiff Michelle Robertson, as parent for minor child S.R., individually, and on behalf of all others similarly situated, and Defendant La Clínica de La Raza, Inc. (“La Clínica”) hereby submit the below Stipulation and Proposed Order to continue La Clínica’s deadline to answer or otherwise respond to the Class Action Complaint.

Currently pending before this Court are La Clínica's Motion to Substitute the United States (Doc. 21) and non-party United States's Motion to Remand (Doc. 12). Plaintiff and La Clínica believe it is in the best interest to extend La Clínica's deadline to answer or otherwise respond to the Class Action Complaint until a determination is made regarding whether this Court has jurisdiction. The parties therefore agree to extend La Clínica's deadline to answer or otherwise respond to the Class Action Complaint to twenty (20) days after a ruling on non-party United States's Motion to Remand. Neither party will be prejudiced by the relief sought herein.

Respectfully submitted,

DATED: April 8, 2024

POLSINELLI LLP

/s/\* Mark Olthoff  
MARK OLTHOFF

*Attorney for Defendant La Clinica de La Raza, Inc.*

DATED: April 8, 2024

COLE & VAN NOTE

/s/\* Laura Van Note  
LAURA VAN NOTE

*Attorney for Representative Plaintiff*

### ORDER

Pursuant to stipulation, IT IS SO ORDERED. La Clínica De La Raza, Inc.'s deadline to answer or otherwise respond to the Class Action Complaint is continued to twenty (20) days after a ruling on non-party United States's Motion to Remand.

DATED: 4/9/2024

  
JUDGE HAYWOOD S. GILLIAM JR.